

MICHAEL POSTAWKO, CHRISTOPHER
BAKER, and MICHAEL JAMERSON,
*On behalf of themselves and a class of
similarly situated individuals,*

Plaintiffs,

V.

MISSOURI DEPARTMENT OF
CORRECTIONS, et al.,

Defendants.

No. 16-CV-4219-NKL-P

DEFENDANTS' RESPONSE CONSENTING TO PLAINTIFFS'
MOTION TO DISMISS INDIVIDUAL DEFENDANTS

COME NOW Defendants Dr. Trinidad Aguilera, Dr. Paul Jones, Georgann Rucker, Geeneen Wilhite, Bonnie Boley, Dr. John Williams, Amanda Yates, Julie Crego, Dr. Ruanne Stamps, Dr. Thomas Pryor, Dr. Ronald Proctor, Dr. Rex Hardman, Laurel Davison, Danette Stieferman, Dr. Thomas Bredeman, Julie Fipps, Jewel Cofield, Jamie Donnelly (f/k/a Jamie Campbell), and Dawn Baker, and submit their Response Consenting to Plaintiff's Motion to Dismiss Individual Defendants, as follows:

1. Plaintiffs filed their Motion to Dismiss Individual Defendants on June 13, 2019. *See* Doc. 286.
2. In their Motion, Plaintiffs seek to dismiss these individual defendants from the litigation entirely, without prejudice. *See* Doc. 286.
3. Defendants Dr. Trinidad Aguilera, Dr. Paul Jones, Georgann Rucker, Geeneen Wilhite, Bonnie Boley, Dr. John Williams, Amanda Yates, Julie Crego, Dr. Ruanne Stamps, Dr. Thomas Pryor, Dr. Ronald Proctor, Dr. Rex Hardman, Laurel Davison, Danette Stieferman, Dr.

Thomas Bredeman, Julie Fipps, Jewel Cofield, Jamie Donnelly (f/k/a Jamie Campbell), and Dawn Baker consent to being dismissed from this litigation.

4. Further, these defendants have no opposition to the dismissal of the other individual named as a defendant in this case, Adrienne Hardy.

WHEREFORE, for the above and foregoing reasons, Defendants consent to Plaintiff's Motion to Dismiss the Individual Defendants in this case, and respectfully request that the Court dismiss these defendants from the litigation.

Respectfully submitted,

/s/ Jessica L. Liss

Jessica L. Liss #51331 MO

Amy J. White, #60411 MO

Carrie L. Kinsella, #65469 MO

JACKSON LEWIS P.C.

222 S. Central Avenue, Suite 900

St. Louis, Missouri 63105

Tel: 314.827.3939

Jessica.Liss@jacksonlewis.com

Amy.white@jacksonlewis.com

Carrie.Kinsella@jacksonlewis.com

***Attorneys for Defendants Baker,
Bredeman, Campbell, Cofield, Davison,
Fipps, Hardman, Proctor, Pryor, Stamps,
Stieferman, Aguilera, Boley, Jones,
Rucker, Wilhite, Williams, Crego and Yates***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 21, 2019, a true and accurate copy of the foregoing was filed electronically with the Court, which will serve a copy on counsel of record:

Anthony E. Rothert
Jessie Steffan
Omri E. Praiss
American Civil Liberties Union of Missouri
Foundation
906 Olive Street, Ste. 1130
St. Louis, MO 63101-1448

Attorneys for Plaintiffs

Gillian R. Wilcox
American Civil Liberties Union of Missouri
Foundation
406 West 34th Street, Suite 420
Kansas City, MO 64111

Attorneys for Plaintiffs

Amy E. Breihan
Megan G. Crane
MacArthur Justice Center at St. Louis
3115 South Grand Blvd., Suite 300
St. Louis, MO 63118

Attorneys for Plaintiffs

Meghan C. Cleary
Wilkinson Walsh & Eskovitz
11601 Wilshire Blvd., Suite 600
Los Angeles, CA 90025

Amelia Igo Pelly Frenkel
Anastasia McLetchie Pastan
Elizabeth Lynn Henthorne
Wilkinson Walsh & Eskovitz
2001 M. Street NW, 10th Fl.
Washington, DC 20036

Attorneys for Plaintiffs

Joshua D. Hawley, Attorney General
D. John Sauer, State Solicitor
Joshua Divine, Deputy Solicitor General
Laura E. Elsbury, Asst. Attorney General
Michael D. Quinlan, Asst. Attorney General
Office of the Attorney General
P.O. Box 899
Jefferson City, MO 65102

***Attorneys for Defendants Missouri
Department of Corrections and
Anne L. Precythe***

/s/ Jessica L. Liss